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19 *Attorneys for Plaintiffs James Porter, Bryan*
20 *Perez, and Dro Esraeili Estepanian*

21 JAMES PORTER, BRYAN PEREZ, and
22 DRO ESRAEILI ESTEPANIAN, on
behalf of themselves and all others
similarly situated,

23 Plaintiffs,

24 vs.

25 TESLA, INC.,

26 Defendant.

27 Case No. 4:23-cv-03878-YGR

28 **STIPULATION TO CHANGE TIME FOR
DEFENDANT TESLA, INC. TO RESPOND
TO THE CLASS ACTION COMPLAINT**

Judge: Hon. Yvonne Gonzalez Rogers

Compl. Filed: August 2, 2023

1 Pursuant to N.D. Cal. Civ. L.R. 6-1 and 6-2, and as supported by the Declaration of Mark
2 A. Feller filed herewith, Defendant Tesla, Inc. (“Tesla”) and Plaintiffs James Porter, Bryan Perez,
3 and Dro Esraeili Estepanian (collectively “Plaintiffs” and together with Tesla, the “Parties”), by
4 and through their undersigned counsel, stipulate as follows:

5 WHEREAS, on August 2, 2023, Plaintiffs filed this action (Dkt. No. 1);

6 WHEREAS, on August 7, 2023, Plaintiffs served a copy of the complaint and summons
7 on Tesla (Dkt. No. 9);

8 WHEREAS, on August 21, 2023, Tesla filed an Administrative Motion to Consider
9 Whether Cases Should Be Related (Dkt. No. 21) seeking to have two cases – *Alejandro Corona*
10 and *Cabanillas & Associates, P.C. v. Tesla, Inc.*, Northern District of California, Case No. 3:23-
11 cv-03902-VKD) and *Samuel Van Diest and Sergy Khalikululov, et al.*, Northern District of
12 California, Case No. 4:23-cv-04098 – related and reassigned to this Court;

13 WHEREAS, considering the pending nature of Tesla’s Administrative Motion to Relate
14 Cases, the number of claims and potential plaintiffs, and the importance of having fulsome
15 briefing of any pre-answer motions, Tesla’s counsel requested, and Plaintiffs’ counsel agreed to, a
16 46-day extension of time for Tesla to respond to the Complaint to October 13, 2023;

17 THEREFORE, the Parties have met and conferred and, through their respective counsel,
18 have stipulated that Tesla’s deadline to respond to Plaintiffs’ Complaint is extended up to and
19 including **October 13, 2023**.

20 1. Tesla shall respond to Plaintiffs’ Complaint on or before October 13, 2023;

21 IT IS SO STIPULATED AND AGREED.

22

23 Dated: August 23, 2023

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By /s/ Mark A. Feller

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Attorneys for Defendant Tesla, Inc.

1 Dated: August 23, 2023
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3 By /s/ William A. Ladnier
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7 *Attorneys for Plaintiffs James Porter, Bryan Perez, and Dro
Esraeili Estepanian*

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9
10 **SIGNATURE ATTESTATION**

11 I hereby attest that, pursuant to N.D. Cal. Civ. L.R. 5-1(i)(3), the concurrence to the filing
12 of this document has been obtained from each signatory hereto.

13
14 Dated: August 23, 2023

/s/ Mark A. Feller

15 Mark A. Feller
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